

Court  
COPY

United States District Court  
for the middle District of Pennsylvania

Wm. Branch  
Plaintiff  
vs.  
Mr Russian  
Defendant

• civil action No. 1:00 CV-00-1728  
•  
• (Judge Conner)  
•

FILED  
HARRISBURG, PA

JAN 23 2004

Brief in Support of motion for  
Discovery OR to Compel Discovery

MARY E. D'ANDREA, CL  
Per [Signature]  
Deputy Clerk

if it Please's the court inmate William Branch CF3756  
humbly PRays this august Tribunal, will Grant this motion  
To allow Discovery OR Compel the Defendants to provide me  
with information in their possession, Per. Fed. Rules of  
Civil Procedure 26 (A) 33 (a)(b)(3) these Rules call for the  
Defendants to cooperate with me in Discovery, Judge Ramb  
Set 30 days to complete Discovery Per Docket Sheet #64 entered  
1-15-02, but to this day Defense has not cooperated nor  
objected to my motion for Discovery, I Recieved one Letter  
from Sear ~~Ser.~~ at D.O.C. but no answer in over 2 yrs  
It is impermissible to Grant Summary Judgement when there  
exist meritorious issues Fed Rules Civil Procedure 56(f).

The defendants argue the C/o Russian was only doing his  
duty but he does not state that I had wrote Request to Staff prior  
to his issuing a misconduct an me, the Request complained about  
his abuse of said Safety and Security checks I also wrote a  
grievance about said checks which Staff never answered

Ms. Surace States she never Retaliated against  
me a close check of misconducts written by her on me  
will Reveal Two misconducts ~~were~~ issued # 295142 Dated  
10-10-97 and # 990495 Dated 9-25-97 Both were upheld

Page ② BRIEF in support of motion for  
The allowance of Discovery OR to compel  
Discovery

I was found Guilty and Removed from my Job. on misconduct 990495 I had asked Mr Friedman Mr Long and MS Surace for Time off because I had a court date in Dist. court Judge Rambo first they Refused and I pressed the issue. So they agreed at the end of the 30 days all this happen. MS Surace Retaliated against me and on the misconduct stated that she ordered me not to go to the law library, Capt Gavin okayed this misconduct, Hearing Examiner Welby lied on the Guilty Plea, I never Plead Guilty. No Due Process. With each one of these defendants they have misstated what actually occurred. I have been Physically attacked by staff without any Provocation from me in fact the officer denied that anything happen I Reported the attack and was put in the Hold for 90 days, Now these Doc. Employee's Look out for each other do you believe I Received a fair investigation at their hands, Their attitude is "what are you a nigger lover"

Respectfully I ask this Just Tribune to grant This motion for Discovery OR to compel Discovery

Proof of Service

MS Mosley esq-  
Strawberry Sq 15FL  
Harrisburg Pa 17120

unsworn Declaration

I affirm under Penalty of the Law that the above is true.

Date 1-16-04

William Branch CF3756  
P.O. Box 256  
Waymart Pa 18472